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March 2, 2015

Court C. VanTassell

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Via E-mail and U.S. Mail:

Ms. Leticia Lane
FOIA Officer
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733
lane.leticia@epa.gov
r6foia@epa.gov

Re: Freedom of Information Act Request
Jumonville, et al. v. Sunset Petroleum, Inc., et al.
18th Judicial District Court, Parish of Pointe Coupee, No.: 44491-C
Our File No.: 57132-0007

Dear Ms. Lane:

This is a request under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and the provisions of 40 C.F.R. Part 2. We are submitting this request on behalf of Maxus Energy Corporation.

Specifically, we request the following:

1. All records, including any electronic records, relating to the proposal, establishment, ownership, operation, maintenance, management, or control of the Big River Permittee-Responsible Mitigation Area, the Big River Mitigation Bank, and/or the project associated with the U.S. Army Corps of Engineers permit no. MVN-2010-1148 (collectively, "Big River mitigation project"), located in Pointe Coupee Parish, Louisiana. This request includes, without limitation, any agency records submitted formally or informally to the U.S. Environmental Protection Agency ("USEPA") from third parties as well as all records produced by the USEPA regarding the Big River mitigation project;

2. All agency records of correspondence or communications relating to the Big River mitigation project, including electronic records involving: (1) the Owner(s) of the Big River mitigation project, including Claude C. Jumonville and the heirs of the Succession of John E. Jumonville, Sr.; (2) any and all Sponsors of the Big River mitigation project, including Delta Land Services, LLC; (3) the Holder of the Conservation Servitude encumbering the property where the Big River mitigation project is located, including the Mississippi River Trust and its agent Brian W. Ballinger; and (4) the other members of the Interagency Review Team of the Big River mitigation project, including the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, and the Louisiana Department of Wildlife and Fisheries;
3. All agency records, including any electronic records, relating to the proposal, application, establishment, ownership, operation, maintenance, management, or control of the Petrologistics Permittee-Responsible Mitigation Area (U.S. Army Corp. of Engineers permit no. MVN-2011-03015) located in Pointe Coupee Parish, Louisiana. This request includes, without limitation, any agency records submitted formally or informally to the USEPA from third parties as well as all records produced by the USEPA regarding the Petrologistics Permittee-Responsible Mitigation Area; and
4. All agency records of correspondence or communications relating to the Petrologistics Permittee-Responsible Mitigation Area, including electronic records, involving: (1) the Owner(s) of the Petrologistics Permittee-Responsible Mitigation Area, including Claude C. Jumonville and the heirs of the Succession of John E. Jumonville, Sr.; (2) any and all Sponsors of the Petrologistics Permittee-Responsible Mitigation Area, including Delta Land Services, LLC; (3) the Holder of the Conservation Servitude encumbering the property where the Petrologistics Permittee-Responsible Mitigation Area is located, including the Mississippi River Trust and its agent Brian W. Ballinger; and (4) the other members of the Interagency Review Team of the Petrologistics Permittee-Responsible Mitigation Area, including the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, and the Louisiana Department of Wildlife and Fisheries.

These documents are being requested for commercial use and in preparation for the above-referenced litigation. Liskow & Lewis agrees to pay all fees chargeable under the regulations for locating, reviewing, reproducing, and transmitting the requested documents. Please remit an invoice for these services to my attention and Liskow & Lewis will promptly remit payment upon receipt. However, if such fees exceed, or are anticipated to exceed \$250, please call me at (504) 556-4015 before you proceed any further with responding to this request.

We are pleased to receive the documents via the delivery method you find most appropriate for the volume of responsive materials but electronic format is preferred. Please note that Liskow &

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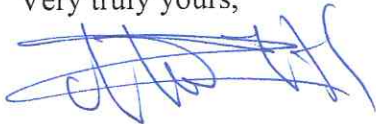
Lewis does not seek, through this request, other companies' trade secrets or financial information that is not otherwise publically available. Accordingly, to the extent that a responsive document contains such exempt information, please provide a redacted version of the document.

The mitigation banking projects that are the subject of this FOIA request are, generally speaking, located approximately three miles south-southeast of New Roads, Louisiana. If your FOIA records search requires a more precise property description, the Big River mitigation project (U.S. Army Corps of Engineers permit no. MVN-2010-1148) includes portions of Section 101, Township 5 South, Range 10 East and Section 97, Township 5 South, Range 11 East. The Petrologistics Permittee-Responsible Mitigation Area (U.S. Army Corps of Engineers permit no. MVN-2011-03015) is located in Section 101, Township 5 South, Range 10 East, of Pointe Coupee Parish, Louisiana.

Please do not hesitate to contact me if I can offer any further detail or clarification for this FOIA request.

Thank you, in advance, for your professional courtesies and attention to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Court C. VanTassell', with a stylized flourish at the end.

Court C. VanTassell

CCV:dll

Enclosure

cc: Mr. Derrick Vallance
George Arceneaux, Esq.
Mark McNamara, Esq.
William Goodell, Jr., Esq.
Elizabeth Roche, Esq.